

Erik Grafe
 Carole Holley
 Hannah M. Payne
 EARTHJUSTICE
 441 W 5th Avenue Suite 301
 Anchorage, AK 99501
 T: 907.277.2500
 E: egrafe@earthjustice.org
 E: cholley@earthjustice.org
 E: hpayne@earthjustice.org

*Attorneys for Plaintiffs Cook Inletkeeper,
 Alaska Community Action on Toxics,
 Center for Biological Diversity, and
 Kachemak Bay Conservation Society.*

Kristen Monsell (*pro hac vice*)
 CENTER FOR BIOLOGICAL
 DIVERSITY
 1212 Broadway St. #800
 Oakland, CA 94612
 T: 510.844.7100
 E: kmonsell@biologicaldiversity.org

*Attorney for Plaintiff Center for
 Biological Diversity.*

Julia Forgie (*pro hac vice*)
 Irene Gutierrez (*pro hac vice*)
 NATURAL RESOURCES DEFENSE
 COUNCIL
 1314 Second Street
 Santa Monica, CA 90401
 T: 310.434.2300
 E: jforgie@nrdc.org
 E: igutierrez@nrdc.org

Thomas Zimpleman (*pro hac vice*)
 NATURAL RESOURCES DEFENSE
 COUNCIL
 1152 15th Street NW, Suite 300
 Washington, DC 20005
 T: 202.513.6244
 E: tzimpleman@nrdc.org

*Attorneys for Plaintiff Natural Resources
 Defense Council.*

IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF ALASKA

COOK INLETKEEPER <i>et al.</i> ,)	
<i>Plaintiffs,</i>)	Case No. 3:22-cv-00279-SLG
)	
v.)	
)	
U.S. DEPARTMENT OF THE INTERIOR <i>et al.</i> ,)	
<i>Defendants,</i>)	
)	
and)	
)	
STATE OF ALASKA)	
<i>Intervenor-Defendant.</i>)	

JOINT UNOPPOSED MOTION TO EXTEND BRIEFING SCHEDULE

Plaintiffs and Federal Defendants jointly move to extend the schedule for briefing on the merits of this case. Plaintiffs and Federal Defendants have conferred with Intervenor-Defendant Alaska, which has stated that it does not oppose this motion.

The existing briefing schedule overlaps significantly with deadlines in other litigation over offshore oil lease sales held pursuant to the Outer Continental Shelf Lands Act and the Inflation Reduction Act. *See, e.g., Healthy Gulf v. Haaland*, No. 1:23-cv-00603-APM (D.D.C. filed Mar. 6, 2023) (Lease Sale 259); *Louisiana v. Haaland*, No. 2:23-cv-01157 (W.D.La. filed Aug. 24, 2023) (plaintiffs' motion for preliminary injunction filed Aug. 29, 2023); *Shell Offshore v. Dep't of Interior*, No. 2:23-cv-01167 (W.D.La. filed Aug. 28, 2023) (plaintiff's motion for preliminary injunction filed Aug. 28, 2023) (Industry challenge to Lease Sale 261; case consolidated with *Louisiana*); *Healthy Gulf v. Haaland*, No. 1:23-cv-2487 (D.D.C. filed Aug. 25, 2023) (Lease Sale 261). Those cases involve some of the same issues and counsel as in this case. To reduce the overlap in briefing schedules, Plaintiffs and Federal Defendants jointly request that the briefing schedule in this case be extended as follows:

Plaintiffs file their opening brief:	October 24, 2023
Federal Defendants file their opposition brief:	December 8, 2023
Intervenor-Defendant files its opposition brief:	December 18, 2023
Plaintiffs file their reply brief:	January 12, 2024
Plaintiffs file the joint appendix:	January 19, 2024

Plaintiffs and Federal Defendants request that this schedule be adopted, as set forth in the attached proposed order.

Respectfully submitted this 22nd day of September, 2023,

s/ Carole A. Holley

Carole A. Holley (Alaska Bar No. 0611076)
Hannah M. Payne (Alaska Bar No. 2105045)
Erik Grafe (Alaska Bar No. 0804010)
EARTHJUSTICE

*Attorneys for Plaintiffs Cook Inletkeeper, Alaska
Community Action on Toxics, Center for Biological
Diversity, and Kachemak Bay Conservation Society*

s/ Kristen Monsell

Kristen Monsell (*pro hac vice*)
CENTER FOR BIOLOGICAL DIVERSITY

Attorney for Plaintiff Center for Biological Diversity

s/ Julia K. Forgie

Julia K. Forgie (*pro hac vice*)
Irene Gutierrez (*pro hac vice*)
Thomas Zimpleman (*pro hac vice*)
NATURAL RESOURCES DEFENSE COUNCIL

*Attorneys for Plaintiff Natural Resources Defense
Council*

TODD KIM
Assistant Attorney General
Environment and Natural Resources Division

s/ Luther L. Hajek

LUTHER L. HAJEK (CO Bar 44303)
United States Department of Justice
Environment and Natural Resources Division
999 18th St., South Terrace, Suite 370
Denver, CO 80202
Ph: (303) 844-1376; Fax: (303) 844-1350
luke.hajek@usdoj.gov

Attorneys for Federal Defendants

CERTIFICATE OF COMPLIANCE WITH WORD LIMITS

I certify that this document contains 245 words, excluding items exempted by Local Civil Rule 7.4(a)(4), and complies with the word limits of Local Civil Rule 7.4(a)(2).

s/ Julia K. Forgie

Julia K. Forgie (*pro hac vice*, Cal. Bar No. 304701)
NATURAL RESOURCES DEFENSE COUNCIL

CERTIFICATE OF SERVICE

I certify that on September 22, 2023, a copy of the foregoing JOINT UNOPPOSED MOTION TO EXTEND BRIEFING SCHEDULE was served electronically on Luther L. Hajek and Mary Hunter Gramling.

s/ Julia K. Forgie

Julia K. Forgie (*pro hac vice*, Cal. Bar No. 304701)
NATURAL RESOURCES DEFENSE COUNCIL